

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re CPI CARD GROUP INC.  
SECURITIES LITIGATION

No. 16-cv-4531 (LAK)

**LEAD PLAINTIFF'S UNOPPOSED MOTION FOR AUTHORIZATION TO NOTIFY  
SETTLEMENT CLASS OF PROPOSED SETTLEMENT AND  
TO SCHEDULE A SETTLEMENT HEARING**

PLEASE TAKE NOTICE that Court-appointed Lead Plaintiff, Alex Stewart (“Lead Plaintiff”), through court-approved counsel Jonathan Gardner of Labaton Sucharow LLP (“Lead Counsel”), hereby moves this Court for an Order, pursuant to Federal Rules of Civil Procedure 23(a), (b)(3), and (e): (i) provisionally certifying the Settlement Class for purposes of the Settlement; (ii) approving the form and manner of providing notice of the proposed class action Settlement to the Settlement Class; (iii) scheduling a date for the Settlement Hearing; (iv) appointing the Claims Administrator recommended by Lead Counsel to administer the Settlement; (v) establishing procedures and a deadline for objecting to the terms of the Settlement, Plan of Allocation, and/or the requested attorneys’ fees and expenses; (vi) establishing procedures and a deadline for seeking exclusion from the Settlement Class; (vii) establishing procedures and a deadline for submitting Claim Forms for payments from the Settlement; and (viii) granting such other and further relief as the Court may deem fair and proper. Defendants do not oppose the relief requested in this motion.

This motion is based on the accompanying Memorandum of Law in Support of Lead Plaintiff’s Unopposed Motion for Authorization to Notify Settlement Class of Proposed Settlement and to Schedule a Settlement Hearing and the Declaration of Jonathan Gardner, dated September 21, 2018, with annexed exhibits, both filed herewith.

A proposed Order Approving Form and Manner of Notice, and Setting Date for Hearing on Final Approval of Settlement, which was negotiated by the Parties to the Settlement, is also submitted herewith.

Dated: September 21, 2018

Respectfully submitted,

**LABATON SUCHAROW LLP**

/s/ Jonathan Gardner

Jonathan Gardner

Michael P. Canty  
Alfred L. Fatale  
Ross M. Kamhi  
140 Broadway  
New York, New York 10005  
Telephone: 212-907-0700  
Facsimile: 212-818-0477  
jgardner@labaton.com  
mcanty@labaton.com  
afatale@labaton.com  
rkamhi@labaton.com

*Lead Counsel for Court-Appointed Lead  
Plaintiff Alex Stewart and the Settlement  
Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 21, 2018, I caused the foregoing Lead Plaintiff's Unopposed Motion for Authorization to Notify Settlement Class of Proposed Settlement and to Schedule a Settlement Hearing to be served electronically through the Court's ECF system upon all ECF participants.

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/s/ Jonathan Gardner

Jonathan Gardner